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March 22, 2000

Secretary

Federal Trade Commission

Room H-159, 600 Pennsylvania Avenue N.W.

Washington, DC 20580



RE: Gramm-Leach-Bliley Act Privacy Rule - Comment

To Whom It May Concern:

I am writing on behalf of the Private Investigator's Association of Florida, Inc. regarding our concern with the proposed regulations to implement Title V of the Gramm-Leach-Bliley Act of 1999. As Immediate Past President and member of the Legislative Committee of a statewide professional private investigator association, I fear we would lose a valuable and very necessary source of locating witnesses and suspects if "non-public personal information" is defined to include simple names and addresses of customers of financial institutions.

It is our impression that the clear intent of Congress was to provide an opportunity for customers of financial institutions to "opt-out" of sharing their personal financial information with non-affiliates of the institutions. The statute provides protection for financial information--not mere names and addresses. If all information available to a financial institution is defined as "non-public personal information," then what is "public"? Congress seems to be offering a distinction by describing financial information. We believe the Act provides opt-out of information regarding credit history, employment and financial assets. But name, address and telephone number should not be classified as "non-public."

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Private investigators play an important role in civil and criminal justice systems which is not understood by many. The information we obtain regarding addresses and telephone numbers is essential to our conduct of business and fulfilling our obligations to consumers. We utilize this information to investigate identity theft, embezzlement, insurance fraud, locate delinquent child support debtors and serve process among other things.

If this information is deemed "non-public personal," only scam artists and criminals will benefit and the law-abiding consumer will be the loser. We urge you to define non-public personal information in the manner that Congress intended.

Sincerely,

A handwritten signature in black ink, reading "Michelle M. Morton". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Michelle M. Morton, FCI